

United States Department of the Interior

NATIONAL PARK SERVICE Carlsbad Caverns National Park

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October 7, 2014

SOP 14-17

To: All Employees and Carlsbad Cavern Trading Company

From: Acting Superintendent, Carlsbad Caverns

Subject: Service Dog Guidelines

The definition of a "service dog" is any dog that has been individually trained to do work or perform tasks for the benefit of an individual with a disability (including a physical, sensory, psychiatric, intellectual or other mental disability). This policy includes matriculated service dogs, in training and graduated. Other species of animals, whether wild or domestic, trained or untrained, are not service animals for the purpose of this definition. Dogs used purely for emotional support are not service dogs, they are therapy dogs and are not permitted. A therapy dog is used for therapeutic activities and does not have rights under ADA (Americans with Disabilities Act).

Director's Order 42 states that:

It is the goal of the NPS to ensure that all people, including the estimated 54 million citizens with disabilities, have the highest level of accessibility that is reasonable to our programs, facilities and services in conformance with applicable regulations and standards. Moreover, one fundamental principle of this Director's Order is that the NPS will seek to provide the highest level of accessibility that is reasonable, and not simply provide the minimum level that is required by law. Consequently, managers are encouraged to exceed the requirements for visitor accessibility through innovative techniques and partnerships whenever possible and reasonable.

Since D.O. 42, NPS leadership has repeatedly stated the desire to improve access to park resources, facilities and programs for people with disabilities. Park managers and staff should strive to create a welcoming environment and experience that mirrors as much as possible the experience of visitors without disabilities. As such, NPS staff should not treat people with disabilities in a manner that suggests that the accommodations that may be associated with them, such as use of a service animal, the need for a sign language interpreter, or the use of a wheelchair, are an inconvenience, a burden or otherwise unwelcome.

Service animals under Department of Justice regulation are defined as dogs that are individually trained to do work or perform tasks for people with disabilities. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability.

Service cannot be "certified" nor are they required to wear an apron or other identifying equipment. Park staff is allowed to inquire about whether the service animal assists with a disability, and what service the dog performs, but should do so only in exceptional circumstances. Many disabilities are not obvious and service animals may be trained to help in ways that are also not obvious.

Service dogs are allowed on all paved roads, pullouts, parking and picnic areas, along Walnut Canyon Desert Drive (Loop Road), on the paved Nature Trail, and at Rattlesnake Springs. Service animals are also allowed inside the cave on the King's Palace Trail, Big Room, Natural Entrance Trail and Bat Flight Amphitheater. Service dogs must be kept on a leash at all times.

At this time, service dogs are not allowed on off-trail cave tours due to the close proximity of safety caution tape on trails that are marking deep drop-offs and protecting park resources. In addition, most service dogs have not been trained to climb ladders, use ropes and belly crawl. Off-trail tours where service dogs are not permitted are: Left Hand Tunnel, Lower Cave, Hall of the White Giant, Spider Cave and Slaughter Canyon Cave.

All service animals are subject to 36 CFR 2.15 pertaining to leash or other restraint devices, pet excrement disposal, unreasonable noise, remaining under control of owner, and leaving pet unattended.

Charles H. Burton Acting Superintendent